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September 22, 2022

VIA ECF

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: Solid 21, Inc. v. Richemont North America, Inc. et al., No. 1:19-cv-01262-LGS
Unopposed Request for Adjournment of Trial Date and Pretrial Conference

Dear Judge Schofield,

We represent Plaintiff Solid 21, Inc in the above captioned matter. We write to request an adjournment of the trial date and final pretrial conference. On September 13, 2022, this Court entered a scheduling order setting a jury trial to begin on January 9, 2023 or the first available date thereafter, and the final pretrial conference for December 19, 2022. ECF No. 160.

Counsel for Plaintiff is lead counsel in another matter in the Western District of Texas, *Proxense, LLC v. Samsung Elecs. Co., Ltd. et al.*, No. 6:21-cv-00210-ADA. That case is set to begin a jury trial on January 17, 2023 with the final pretrial conference on January 3, 2023. Ex. A at 6. Because these dates overlap in the two matters, and Plaintiff's counsel is lead counsel in the Texas matter and the only counsel of record for Plaintiff in this one, good cause exists to adjourn the trial date and pretrial conference date here. Should the Court find it helpful, Plaintiff's counsel can be ready for a trial beginning in March 2023.

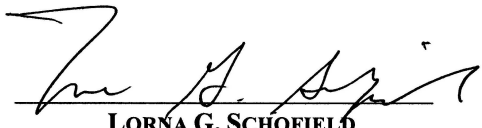
This is Plaintiff's first request to modify this scheduling order. This request is not made for the purpose of undue delay or advantage. Plaintiff has conferred with Defendants on this request, and Defendants do not oppose.

Respectfully,

/s/ David L. Hecht
David L. Hecht
Counsel for Plaintiff Solid 21, Inc.

cc: Counsel of Record (via ECF) **Application GRANTED. A new trial scheduling order will issue separately.**

Dated: September 23, 2022
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE